

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03 MDL 1570 (GBD) (FM)
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This document relates to: *Federal Ins. Co., et al. v. Al Qaida, et al.*, 03-cv-06978 (GBD) (FM)

**AFFIRMATION OF SEAN P. CARTER TRANSMITTING EVIDENCE IN SUPPORT  
OF THE MOTION OF THE AXA, CHUBB, MUNICH RE AMERICA, AND  
ONEBEACON INSURANCE GROUP PLAINTIFFS TO ASSESS DAMAGES  
AGAINST IRAN FOR CLAIMS ARISING UNDER 28 U.S.C. § 1605A(d)**

Sean P. Carter affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and am a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following documents submitted in support of the Motion of the AXA, Chubb, Munich Re America and OneBeacon Insurance Group plaintiffs to assess damages against Iran for claims arising under 28 U.S.C. § 1605A(d).

2. Attached hereto as Exhibit 1 is a true and correct copy of the December 22, 2011 judgment issued by the Clerk of Court in favor of moving plaintiffs and against al Qaida.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Affidavit of Donald L. Siegrist, Jr., in support of the proof of damages for Chubb & Son, a division of Federal Insurance Company on behalf of itself and as manager of its insurance subsidiaries.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Affidavit of Thomas J. Toth in support of the proof of damages of American Alternative Insurance Company, the Princeton Excess and Surplus Lines Insurance Company and Great Lakes Reinsurance (UK) Limited.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Affidavit of John F. Murphy in support of OneBeacon Insurance Group's proof of damages.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Affidavit of Steven Judovin in support of AXA's proof of damages.

Executed from Philadelphia, Pennsylvania on November 13, 2015.

/s/  
Sean P. Carter, Esquire